

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW MEXICO

In re: Safe Site Youth Development, Inc. Case No. 19-10282 T11
EIN: 27-1492193
Debtor.

CREDITOR LISSA GUZMAN'S WITNESS LIST

COMES NOW, Creditor Lissa Guzman, by her counsel, Roybal-Mack & Cordova P.C. (Amelia P. Nelson), and hereby files her Witness List for the hearing scheduled regarding Claim #5 set on February 19 and 20, 2020.

1. Lissa Guzman, 10617 Pennyback Park NE, Albuquerque, NM 87123; (505) 306-7265 (may be contacted via counsel, Roybal-Mack & Cordova, P.C.).

Ms. Guzman is expected to testify regarding her employment as Human Resources and other activities with Safe Site, the workplace environment, payments from Safe Site, loans made to Safe Site and amounts remaining owed, termination from Safe Site, and the steps taken to address unpaid wages and loans.

2. Judith Seligman, 10916 La Grange Park NE, Albuquerque, NM 87123; (505) 710-0791 (may be contacted via counsel, Roybal-Mack & Cordova, P.C.).

Judith Seligman is expected to testify regarding her and Ms. Guzman's employment with Safe Site, the workplace environment, payments from Safe Site, repayment of any loans made to Safe Site, termination from Safe Site, and the steps taken to address unpaid wages and loans.

3. Kristen Robinson, 6140 Cuesta Place NW, Albuquerque, NM 87120; (505) 410-4879: Ms. Robinson, Lissa Guzman's sister, is expected to testify regarding Lissa Guzman's employment with Safe Site, Ms. Robinson's interactions with Safe Site and Feliz and Sara Candelaria, and information and data related to employment.

4. Felix Candelaria, Debtor (via counsel), individually and on behalf of Safe Site Youth Development, Inc.

Felix Candelaria as the director of Safe Site is expected to testify regarding Lissa Guzman's work, duties, responsibilities, pay structure, and other aspects of employment and wages.

5. Leigh Van Gilst, CPA & Associates, LLC, Accountant for Safe Site, debtor, c/o Debtor Counsel.

CPA Van Gilst is expected to testify regarding the tax documents and returns prepared on behalf of Debtor Safe Site for 2016, 2017, 2018.

6. Julian Armijo, Safe Site employee, (505) 988-6678

Mr. Armijo is expected to testify regarding his observations of the Safe Site work environment the participation in that environment by Judith Seligman and Lissa Guzman.

7. Kevin (LNU), Performance Computer, LLC Repair Tracker, 544 Main Street NW, Los Lunas, NM 87031; (505) 866-1175

Kevin of Performance Computer is expected to lay the foundation for the PC Repair Tracker exhibit, and to testify regarding the instructions and directions given by Debtor Felix Cadelaria regarding the installation of computer equipment at Safe Site.

8. Any witnesses necessary for impeachment or rebuttal.

9. Any witnesses listed by Debtor and not objected by Ms. Seligman.

10. Ms. Guzman respectfully reserves the right to add additional witnesses for good cause and as is just and necessary pursuant to court approval and the rules.

Respectfully Submitted,

ROYBAL-MACK & CORDOVA, P.C.

/s/ Amelia P. Nelson Electronically filed 2/10/2020

AMELIA P. NELSON

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CERTIFICATE OF SERVICE

In accordance with NM LBR 9036-1 and Fed.R.Civ.P. 5(b)(3)), this certifies that service of the foregoing will be made on this 10th day of February 2020, via the notice transmission facilities of the case management and electric filing systems of the Bankruptcy Court, to all parties that have filed for electronic notice.

/s/ Amelia P. Nelson filed Electronically 2/10/2020

AMELIA P. NELSON